## NEG Q & A

- Can additional companies be added?
   This will require a modification request to DOL. If allowed by DOL, the answer is "yes."
- 2. Can an individual who was laid off from a company listed in the grant, who subsequently went to work for another company and was then laid off from the second company, be served under the NEG?

DOL Response: Generally, if an individual went to work for Company B after having been laid off from Company A, the individual would be considered to have been laid off most recently from Company B and thus would not fall under the NEG for Company A.

However, if the wages paid by Company B were less than that paid by Company A and the state/local area considered it a temporary job, they could make a decision that the Company A layoff was the qualifying layoff. That would be the case for any eligibility for NRPs (if they are a factor) as well.

UI would use the Company A layoff since most of the wages paid for which UI eligibility would be considered would be Company A. Also, if it was a very short term employment with Company B, the provision at WIA 101(9)(A)(ii) could be applied and might make the Company B employment irrelevant, based upon local WIB policies.

- 3. In the grant application, companies employing workers over several areas were only listed once. Can a local area serve DWs in their area who were dislocated from a company listed by another LWIA in the grant, but did not budget to serve those DWs? Yes. However, if an LWIA did not include the company in budget, there are no additional funds available to serve these DWs.
- 4. May DWs from Kmarts across the state be served under this NEG, although only one Kmart is listed in the grant? Response from DOL: You will need to do a modification because only that store location was included to serve only 69 workers. This does not reflect the additional locations or additional workers. This should be done the same way you added International Paper which will include a letter to Fred Tello with a cc: to me. Of course, this will affect your enrollments and expenditures.
- 5. How do you prioritize who to serve when there have been more layoffs from the same companies listed in the grant? This is a local area call—Follow local plan
- 6. Are books, fees, etc. included in the costs covered by pre-award?

  If the LWIA included books, fees, etc. in the line items "Tuition payments/ITAs" or "Other Supportive Services" this cost is covered by pre-award.
- 7. When can I start charging to the NEG?
  January 1. Charges against the NEG are when costs are incurred—not when bill is received.
- 8. Can we reimburse 2003 formula funds from the NEG?

Reimbursement goes back to grant from where funds were expended

- 9. What is the CFDA #? 17.260
- 10. If some areas do not expend their initial allocation, does that hold up requesting the remaining funds available in the NEG award?
  Yes
- May funds be transferred from one LWIA to another if the LWIA cannot expend initial money?
  Clarification is being requested
- 12. Do we track NEG by line item? Yes
- 13. Is there a time limit to spending initial funds?

  No. However, grant award states: "The initial level of NEG funding should support project operations at least through June 30, 2003." Note: Remaining NEG funds cannot be requested until initial funds are expended. Response from DOL: Response: Approximately 1 month or 40 days prior to depleting all your funds, you will have to do a new budget request showing enrollments, expenditures, and the need for additional funding. You will have to do an overall budget. The request will be directed to Fred Tello with a cc: to Sonia Johnson.

This is called incremental funding. Pursuant to the Sec. Of Labor's approval, the Grantee is approved for a grant project of up to \$10,750,340 million for a project to serve approximately \_\_\_\_\_ # (1,753) dislocated workers with an initial increment of \$5,159,226. Release of additional funds will be based on project performance (including enrollments and expenditures) continuing need;.....

- 14. If a LWIA expends all of their initial allocation and the remaining NEG funds have not been received, how will they continue to serve participants?
  Rapid Response Additional Assistance may be available for transition
- 15. May LWIAs go ahead and transfer formula dollars through 9/30/02? Yes. However, DTR has requested a formal clarification from DOL as to transfer of funds through 12/31/02.
- Where should funds be charged for a participant who needs more training at the end of the NEG grant? Formula funds, Rapid Response Additional Assistance, or any other funding stream participant is eligible for.
- 17. How much time does a LWIA have to close-out the NEG ending 12/31/04? 30 days
- 18. If a LWIA does not spend all of the pre-award, may the LWIA use these funds for general grant expenses?
  DTR much ask permission from DOL

- 19. When should pre-award and supplemental funds be drawn down?

  By the end of February
- 20. Why does a LWIA have to send a check to DTR. If the LWIA has not paid their invoices, do they have to send check?
  Appropriate cash-management is required
- 21. Is NEG draw down on same schedule? Yes
- 22. What date do you put on the pre-award eligibility form?

  There is not a specific pre-award eligibility form. You will use the WIA 20N-2 form and will date it the date that you determine them eligible for pre-award funding, which is the date you complete the form. Do NOT back date.
- 23. Must participants be a Category 2 to be eligible? In some circumstances may a participant in a Category 1 be served?

  Language from NEG Award letter: "Because NEG resources are limited, they are targeted to substantial layoffs, i.e. layoffs involving 50 or more workers with the assumption that layoffs less than that number can be served through the formula dislocated worker program." "This grant is approved to serve companies included in the application of 50 or more workers."
- 24. Should reporting be done by line item? Yes
- 25. May LWIAs go ahead and report NEG expenses on the January report? Yes
- 26. Available balance is incorrect on form distributed to LWIAs. What is correct balance. Will Robinson will provide correct available balance.
- 27. May LWIA transfer up to 20% between line items?
  Only with approval from DOL
- 28. May funds be charged to the NEG for a participant who has been terminated between July 1 December 31?

Yes. Only <u>expenses incurred</u> 7/1/02-<del>12/1/31</del> <u>9/30/02</u> DTR has requested a formal clarification from DOL as to transfer of funds through 12/31/02

29. How do you enter a participant who is funded by DW formula funds and NEG funds into EKOS?

Refer to Action Memo 62 –NEG Policy Procedures

30. Do you attach an NEG participant who has received funding through DW formula funds to a new service?

See #29

31. Is a participant who enters the system for the first time considered "New Service?" Yes

Revised 2/12/03

Revised 2/12/03

Revised 2/12/03

32. How do you record information for someone who graduated in December, but funds will be charged against the NEG for this person?

See #29

Revised 2/12/03

- 33. LWIA budgeted for pre-award expenses thru December and person exited in December—may funds still be charged to the NEG?

  Same as #28
- 34. How do you track a participant who has exited who qualified for pre-award? See #29

Revised 2/12/03

- 35. Active in agency vs. enrollment?
- 36. If a new participant is served in January, can LWIA change funding streams from DW to NEG?
  Yes
- 37. Where will new participants show up in performance? If only NEG—will show up in NEG performance.
- 38. Where will split participants show up in performance?

  Both DW & NEG
- 39. If participant is still in system after 12/31/04, where is performance tracked?

  Both DW & NEG
- 40. Does an NEG recipient eligible for an ITA, have to select from State Provider list?

  Any participant funded through an ITA must choose a provider from the State's Eligible Training Provider List.
- 42. Does tuition include ITA, OJT, contracts?

  Report ITA, OJT, contracts on separate line items as outlined in budget
- 43. Will the monthly MIS bill be affected by the NEG?

  Currently MIS bills are for charges not related to participants, but are for hardware and connecting lines. The EKOS bill will most likely be affected by NEG participants, but the allocation methodology has not been established for the EKOS costs. At this time, the NEG should result in no additional MIS charges.

Revised 2/12/03

- 44. Under the NEG guidelines for monitoring, does this mean DTR monitors will visit LWIAs 3 times in the next seven months to meet NEG and compliance monitoring? Can the monitoring schedule be adjusted to eliminate so many LWIA visits?
  Monitoring schedule can be adjusted to eliminate additional visits to LWIAs
- 45. Will a DOL representative monitor at the 90-day and midpoint of the NEG? DOL will do a <u>sampling</u> monitoring of NEG recipients at the midpoint
- 46. What is the project operator agreement? N/A

- 47. What is customer satisfaction expectation under NEG? Customer Satisfaction does not apply under NEG.
- 48. Will 90-day review include monitoring pre-award costs? Yes
- 49. Does DOL have any plans to modify monitoring procedures since the guidelines were written in 1996?
   Have not received word from DOL on this issue.
- 50. Does the LWIA do subrecipient monitoring at the 90-day and midpoint intervals? LWIAs should follow normal monitoring schedule/policy
- 51. If a participant is Trade eligible and no Trade dollars are available, what documentation will the monitors require to verify? DTR has spoken with DES and has agreed that DES will periodically email all LWIA's correspondence on the availability of TRADE money. In the event that a participant, who is TRADE eligible chooses to enter training and there is no TRADE money available, place the DES email into the participants file for documentation that there is no TRADE money available at the time of enrollment. No further documentation is required. If and when TRADE money does become available, DES will email all the LWIAs with this information.
- 52. If a case manager travels to a school for a monthly visit and some participants are dislocated, some are adult and some are NEG how do I split the travel?

  Allocate the cost of the trip to the school based on the number of participants the school is serving if the purpose of the case manager's visit relates to all three types of participants. If the case manager only visits with the adult participants then adult should be charged the total amount of the costs. The same would apply if the purpose of the case manager visit was only related to NEG or Dislocated Workers.

The underlying principle of "who benefited" from the cost applies. The costs principles in A-87 states that the allocation base should result in a distribution of cost based on the benefit received from that cost.

53. Do you have to get signatures from the participant on the WIA 20-N2, if the participant is already enrolled or if the participant is served with pre-award money and they may already be terminated or completed?

You do not have to get signatures for those who are already in training and you are only transferring their funding streams or for those who are pre-award participants. You need signatures for any participants who are new enrollees. The WIA 20-N2 must be completed for <u>all</u> individuals who are under the NEG. For those forms, that a signature is not required, the form will require a signature of the case manager who completes the form.